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January 22, 2020

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
Ashton, et al. v. Al Qaeda Islamic, et al., 02-CV-06977 (GBD) (SN)

Dear Judge Daniels:

We represent certain non-immediate family members of individuals killed in the terrorist attacks on September 11, 2001, and write to ask that this Court grant an extension of time by which those plaintiffs must file objections to the Magistrate Judge's Reports and Recommendations of December 19, 2019 (ECF No. 5387) and January 21, 2020 (ECF No. 5701) denying certain claims. This is the first request for an extension of time regarding the January 21, 2020 Report and Recommendation and the second request regarding the December 19, 2019.

We are still in the process of weighing the merits of objections to three of the motions denied in the December 19, 2019 Report and Recommendation, as well as the single denial in the January 21, 2020 Report and Recommendation. This litigation has had several recent and approaching deadlines, including the Court's January 15, 2020 deadline for filing of motions for final damages for the estates of those killed on September 11, 2001 and the upcoming January 31, 2020 deadline for filing of any potential motions for final damages for individuals physically injured in the terrorist attacks of September 11, 2001. Additionally, the United States Victims of State Sponsored Terrorism Fund has a deadline of February 19, 2020 for filing any claims that will participate in the next round of distributions.

While objections to the December 19, 2019 Report and Recommendation would be due today (see ECF No. 5473, granting extension of time) and the January 21, 2020 Report would be due February 5, 2020, given the substantial number of pending motions before the Court and the other deadlines, we respectfully request that this Court extend the time by which objections must be filed by 45 days from today, which will allow the non-immediate family members an opportunity to weigh and present any potential legal arguments or factual objections to their denials.

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As Iran is the only defendant to this motion and has defaulted (and there is no suggestion that it will appear) this extension of time will impose no undue prejudice.

For the foregoing reasons, we believe that good cause exists to grant this letter-request for an extension of time by which to file any objections to the denials in the Reports and Recommendations (ECF Nos. 5387 and 5701) until March 9, 2020. We also ask that to the extent the Reports and Recommendations grant certain motions for final damages solatium judgments, this Court, if inclined to adopt the recommendations to grant those motions, not delay doing so pending objections to the denials.

Respectfully,

Kreindler & Kreindler LLP

/s/ Megan W. Benett

cc: All counsel of record via ECF